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3 UNITED STATES DISTRICT COURT  
4 NORTHERN DISTRICT OF CALIFORNIA  
5 SAN FRANCISCO DIVISION

6 IN RE: UBER TECHNOLOGIES, INC.,  
7 PASSENGER SEXUAL ASSAULT  
8 LITIGATION

MDL No. 3084 CRB

**[PROPOSED] ORDER REGARDING  
KHERKHER GARCIA LLP'S MOTION TO  
WITHDRAW AS COUNSEL OF RECORD**

9 This Document Relates to:

Judge: Honorable Charles R. Breyer

10 *John Doe KGDB 018 v. Uber*  
11 *Technologies, Inc., et al.*, Case No. 3:25-  
cv-04355

12  
13 **[PROPOSED] ORDER**

14 Having considered Kherkher Garcia, LLP's ("Kherkher Garcia") Motion to Withdraw as  
15 Counsel of Record for Plaintiff John Doe KGDB 018 (ECF 4699), the Court finds that, given that  
16 Uber has discovered evidence that Kherkher Garcia submitted a fraudulent Plaintiff Fact Sheet (PFS)  
17 in this case, granting withdrawal would cause prejudice to Plaintiff and Uber, likely delay the progress  
18 of this multi-district litigation, and potentially harm the administration of justice.

19 The Court therefore hereby ORDERS that Kherkher Garcia's Motion to Withdraw is DENIED.

20 **IT IS SO ORDERED.**

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22  
23 Dated: \_\_\_\_\_, 202\_\_

24 \_\_\_\_\_  
HON. CHARLES R. BREYER  
United States District Court Judge